

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

**JACKSON LEWIS LLP
One North Broadway, Suite 1502
White Plains, New York 10601
(914) 328-0404
Joseph A. Saccomano, Jr. (JS 7504)**

**JACKSON LEWIS LLP
59 Maiden Lane
New York, New York 10038
Nicole Quick Saldana (NS 6524)**

-----X		
DEBRA CHAMBERS-ENGLISH,	:	
	:	
Plaintiff,	:	Civ. No: 05-2976 (DC)
	:	
-against-	:	<u>NOTICE OF MOTION</u>
	:	
UNISYS CORPORATION,	:	
	:	
Defendant.	:	
-----X		

PLEASE TAKE NOTICE that upon the accompanying Local Rule 56.1 Statement of Material Facts, Defendant's Memorandum of Law in Support of its Motion for Summary Judgment, the Affidavit of Joseph A. Saccamano, Jr. Esq., with attached exhibits, and the Affidavits of Keith Noble, Armando Campea, James McKenna and Alan Schwartz, Defendant Unisys Corporation ("Defendant"), by and through its undersigned attorneys, Jackson Lewis LLP, will move this Court before the Honorable Denny Chin at the United States Courthouse, Southern District of New York, 500 Pearl Street, New York, New York 10007 for an Order pursuant to Rule 56 of the Federal Rules of Civil Procedure granting Defendant summary judgment as to all of Plaintiff's claims, and dismissing Plaintiff's Complaint in its entirety, and for such other and further relief as the Court may deem just and proper.

Pursuant to the Court's Order dated August 9, 2006, Plaintiff's answering papers are due to be served on September 26, 2006 and Defendant's reply is due to be served on October 10, 2006.

Respectfully submitted,

JACKSON LEWIS LLP
One North Broadway
15th Floor
White Plains, New York 10601
(914) 328-0404
(914) 328-1882

Dated: August 25, 2006
New York, New York

By: s/ Joseph A. Saccomano, Jr.
Joseph A. Saccomano, Jr., Esq. (JS 7504)

Nicole Quick Saldana, Esq. (NS 6524)
JACKSON LEWIS LLP
59 Maiden Lane
New York, New York 10038-4502
(212) 545-4000
(212) 972-3213 Facsimile

Alan Kintisch, Esq. (Admitted *pro hac vice*)
UNISYS CORPORATION
Township Line & Union Meeting Roads
P.O. Box 500
Blue Bell, Pennsylvania 19424-0001

ATTORNEYS FOR DEFENDANT
UNISYS CORPORATION

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-against-	:	
	:	
UNISYS CORPORATION,	:	
	:	
Defendant.	:	
-----X		

CERTIFICATE OF SERVICE

I hereby certify that on the 25th day of August 2006 I electronically filed Local Rule 56.1 Statement of Material Facts, Defendant's Memorandum of Law in Support of its Motion for Summary Judgment, the Affidavit of Joseph A. Saccamano, Jr. Esq., with attached exhibits, and the Affidavits of Keith Noble, Armando Campea, James McKenna and Alan Schwartz, using the ECF system and I hereby certify that I have mailed by pre-paid Federal Express Mail the papers to Plaintiff's counsel of record at: Stephen T. Mitchell, Esq. 67 Wall Street, Suite 2211, New York, NY 10005.

s/ Joseph A. Saccomano, Jr.
Joseph A. Saccomano, Jr.